

EXHIBIT K

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

ELIZABETH SINES, SETH WISPELWEY,
MARISSA BLAIR, APRIL MUNIZ, MARCUS
MARTIN, NATALIE ROMERO, CHELSEA
ALVARADO, THOMAS BAKER and JOHN
DOE,

Plaintiffs,

v.

JASON KESSLER, RICHARD SPENCER,
CHRISTOPHER CANTWELL, JAMES
ALEX FIELDS, JR., VANGUARD
AMERICA, ANDREW ANGLIN,
MOONBASE HOLDINGS, LLC, ROBERT
“AZZMADOR” RAY, NATHAN DAMIGO,
ELLIOT KLINE a/k/a/ ELI MOSELY,
IDENTITY EVROPA, MATTHEW
HEIMBACH, MATTHEW PARROTT a/k/a
DAVID MATTHEW PARROTT,
TRADITIONALIST WORKER PARTY,
MICHAEL HILL, MICHAEL TUBBS, LEAGUE
OF THE SOUTH, JEFF SCHOEP, NATIONAL
SOCIALIST MOVEMENT, NATIONALIST
FRONT, AUGUSTUS SOL INVICTUS,
FRATERNAL ORDER OF THE ALT-
KNIGHTS, LOYAL WHITE KNIGHTS OF THE
KU KLUX KLAN, and EAST COAST
KNIGHTS OF THE KU KLUX KLAN a/k/a
EAST COAST KNIGHTS OF THE TRUE
INVISIBLE EMPIRE,

Defendants.

Civil Action No. 3: 17-cv-00072-NKM

**DECLARATION OF OREN SEGAL IN SUPPORT OF PLAINTIFFS’ SUBMISSION
REGARDING VENUE FOR TRIAL AND TRIAL LOGISTICS**

I, Oren Segal, declare as follows:

1. I am the Vice President of the Anti-Defamation League's Center on Extremism ("the COE"), which is recognized as a leading authority on extremism, terrorism, and all forms of hate in the United States.

2. In that capacity, I study extremist activity and trends to help law enforcement, policy makers, the general public and others understand the ideologies, tactics and threats posed by extremist individuals, groups and movements.

3. I provide this declaration in support of Plaintiffs' Submission Regarding Venue for Trial and Trial Logistics.

4. The statements made in this declaration are based on my personal knowledge. If called to testify, I could and would testify under oath competently and truthfully to each of the statements in this declaration.

5. For over twenty years, I have developed a particular expertise in the activities of extremists – both online and on the ground – and have trained law enforcement personnel, testified before Congress, worked with the tech industry, and offered my expertise at various conferences including a White House Summit on Countering Violent Extremism.

6. Given my background, in June 2021, attorneys from Kaplan Hecker & Fink LLP approached me for my opinion on whether holding in trial in Charlottesville could be more dangerous to the public than holding it in another part of the state of Virginia.

7. If past extremist events are any indication, the specific location of the trial will likely not have an appreciable impact on extremists who may decide to protest the trial, demonstrate support for the defendants or otherwise show up.

8. Past events that have attracted large numbers of extremists have drawn attendees

from many different states.

9. This is due to the fact that as a result of social media, news of a change of venue will become known almost immediately and various extremists who are sympathetic to Defendants likely will start communications with each other about the trial and its new location.

10. For example, in January 2020, a gun rights "Lobby Day" was held on the steps of the state capitol in Richmond, Virginia, attracted people from at least 17 states. Among the extremists who attended were Oath Keepers, Three Percenters, Proud Boys, and others. Some people held signs and flags that referenced QAnon, and the anti-government Boogaloo Bois appeared in notable numbers. Even smaller gatherings and protests can draw people from multiple states. For example, in May 2021, the antisemitic Goyim Defense League held events in Florida, which attracted approximately 20 participants from at least five states.

11. While it remains unclear who may decide to show up to this trial, I do not believe the venue will have a significant impact on whether or not extremists and others decide to show up.

12. I declare under penalty of perjury that the foregoing is true and correct. Executed on June 11, 2021.


Oren Segal